REMARKS

Claims 7-9 are rejected under 35 U.S.C. 102(b) as being anticipated by applicant admitted prior art (AAPA)(Fig.2). Claims 7-9 are rejected under 35 U.S.C. 102(a) as being anticipated by Rostoker et al. (6,407,434). Claims 1-6 are rejected under 35 U.S.C 103(a) as being obvious over AAPA(Fig.2, [0006]-[0007]) in view of Rostoker et al. (6,407,434) or Sercu et al., "STUDY OF GRIDDING AND CELL-CELL INTERACTIONS IN THE METHOD OF MOMENTS ANALYSIS OF ARBITRARILY SHAPED PLANAR CIRCUITS", IEEE, 1993, PP. 753-756.

1. Response to the rejection of claims 7-9 under 35 U.S.C. 102(b):

Please first refer to Fig.3 of this application. This application discloses a method of dividing a semiconductor integrated circuit pattern. The method discloses depicting **a dividing line 34** to divide the polygonal planar 36 into the unit figures 38, the unit figures 38 **only arranged sequentially and horizontally.** Besides, the dividing line 34 also divides the unit figures 38 of the polygonal planar 36 into at least two regions, having **two adjacent unit figures being respectively divided into different regions.**

Next, please refer to Fig.2 of this application. The AAPA discloses first depicting a **horizontal line** 16 to divide the polygonal planar 14 into a top portion 14a and a bottom portion 14b. Then, a plurality of **vertical line segments** 18 must be formed so as to divide the polygonal planar 14 into a plurality of unit figures 20. So, the AAPA just teaches how to divide the polygonal planar 14 into a plurality of unit figures 20.

Thereof some of the unit figures 20 is **arranged sequentially and horizontally,** some of the unit figures 20 is **arranged sequentially and vertically.**

In conclusion, the AAPA discloses dividing the polygonal planar 14 into unit figures 20, some of the unit figures 20 **arranged sequentially and horizontally and** some of the unit figures 20 **arranged sequentially and vertically. This application** discloses dividing the polygonal planar 14 into unit figures 20 that are **only arranged sequentially and horizontally.** Therefore, features in the claims 7-9 are novel and never disclosed, so consideration of the claims 7-9 is politely requested.

2. Response to the rejection of claims 7-9 under 35 U.S.C. 102(a):

Rostoker et al. discloses a **cell architecture** used for the **IC layout.** The cell architectures include triangles, rectangles, trapezoids, parallelograms, and other shapes (col.6, lines 6-11, & col.85 lines 1-67).

However, this application discloses a method to divide the semiconductor circuit pattern into a plurality of unit figures **so as to convert a semiconductor circuit pattern data into input graphic data of a writer,** and then the writer is able to use the input graphic data to draw the circuit pattern on a photo mask or a substrate.

Therefore, the disclosure of Rostoker et al. and the disclosure of this application are applied to the **different fields.** Therefore, features in the claims 7-9 are novel and

never disclosed, so consideration of the claims 7-9 is politely requested.

3. Response to the rejection of claims 1-6 under 35 U.S.C. 103(a):

Sercu et al. discloses first dividing the polygonal planar circuit into triangular and rectangular cells. **The cell-cell interaction** is then calculated (pp.753, Abstract).

However, this application discloses a method to divide the semiconductor circuit pattern into a plurality of unit figures **so as to convert a semiconductor circuit pattern data into input graphic data for a writer**, and then the writer is able to use the input graphic data to draw the circuit pattern on a photo mask or a substrate.

So the disclosure of Sercu et al. and the disclosure of this application are applied to the **different fields.**

Further, as mentioned above, the AAPA and this application disclose **different dividing methods**, and the disclosure of Rostoker et al. and the disclosure of this application are applied to the **different fields.**

In conclusion, the rejection over AAPA in view of Rostoker et al. or Sercu et al. is not suitable for this application. So consideration of claims 1-6 is politely requested.

Sincerely,

Winston Hsu Date: 4/9/2006

Winston Hsu, Patent Agent No. 41,526
P.O. BOX 506
Merrifield, VA 22116
U.S.A.
e-mail : winstonhsu@naipo.com.tw
(Please contact me by e-mail if you need a telephone communication and I will return your call promptly.)